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## Certification of CPNI Filing February 6, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554.

FILED BY ECFS ONLY

REFERENCE: EB-06-TC-060

Dear Ms. Dortch:

I am the General Manager of FTTH Communications LLC ("FTTH"), a telecommunications carrier operating in the State of Minnesota providing local and interexchange services on a facilities-based and resale basis. As an officer of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's rules set out in 47 CFR § 64.2009.

In response to the Commission's January 30, 2006, Public Notice in DA 06-223, the following is a statement which explains how FTTH's operating procedures ensure that it is in compliance with the Commission's rules governing handling of Customer Proprietary Network Information ("CPNI.")

FTTH is complying with CPNI rulemaking in the following ways:

- (a) FTTH has implemented procedures in accordance with Part 64 of Title 47 Subpart U (Customer Proprietary Network Information). FTTH will only allow for use of CPNI according to section 64.2005 (Use of Customer Proprietary Network Information Without Customer Approval). All of uses of CPNI are not allowed.
- (b) FTTH has trained and provided information to all employees who have access to CPNI regarding FTTH's policies on access to CPNI records.



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(c) FTTH maintains records of any marketing information sent to customers; FTTH will only solicit utilizing section 64.2005 as guidance. FTTH does not sell or allow access to CPMI by third parties. In 2005 FTTH did not implement any marketing programs utilizing CPMI information.

(d) FTTH has in place a supervisory review process regarding compliance with CPMI for outbound marketing situations which includes approval by the General Manager. FTTH does not utilize outbound marketing in its organization.

Please feel free to contact me with any questions regarding this letter.

Sincerely, Sincerely,

John R. Schultz General Manager

cc: Byron McCoy, Telecommunications Consumers Division (by email)

Best Copy and Printing, Inc. (by email)

CK Sandberg, Lockridge Grindal Nauen PLLP